

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-318-E

In the Matter of:)	
)	
Application of Duke Energy)	PETITION TO INTERVENE
Progress, LLC, for Adjustment of)	
Rates and Charges Applicable to)	
Electric Service in South Carolina)	

The South Carolina State Conference of the National Association for the Advancement of Colored People (“South Carolina NAACP”), the South Carolina Coastal Conservation League (“CCL”), and Upstate Forever (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. The South Carolina NAACP is a nonpartisan, nonprofit civil rights organization founded in 1939, with its principal place of business located in Columbia, South Carolina. The South Carolina NAACP is the leading civil rights organization in South Carolina and is made up of 54 active branches and councils/chapters with approximately 8,425 individual members throughout the state of South Carolina, including in the Duke Energy Progress (“DEP”) service area. Those South Carolina NAACP members would be subject to the direct impacts of DEP’s proposed electricity rates and fixed charges. The South Carolina NAACP’s primary focus is the protection of the civil rights of all people; ensuring equity in the areas of education, healthcare access

and environmental justice, criminal justice, voting rights, political engagement, and economic sustainability; and expanding youth and young adult engagement.

2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DEP and who would be subject to the direct impacts of DEP's proposed electricity rates and fixed charges.

3. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. The principal address of Upstate Forever is 507 Pettigru Street, Greenville, South Carolina 29601. Upstate Forever has members in South Carolina who receive electricity service from DEP and who would be subject to the direct impacts of DEP's proposed electricity rates and fixed charges.

4. Petitioners and their members have a direct and substantial interest in the rates and charges imposed by DEP for electric service in South Carolina. Petitioners' members who receive electricity service from DEP at their homes and businesses will be directly affected by the rate increase requested by DEP and the proposed increase to the basic facilities charge for residential customers. Petitioners and their members are also interested in promoting better rate design and increased investments in low-income energy efficiency, demand-side management, rooftop solar, and other clean, distributed energy resources.

5. Petitioners seek to intervene in this proceeding in order to advocate for the interests of low-income customers, smart and equitable rate design, and energy efficiency

programs to provide bill relief to DEP's customers. If allowed to intervene, Petitioners plan to present their positions in prefiled testimony and to participate in the evidentiary hearing.

6. Petitioners are represented by the following counsel in this proceeding:

Stinson Woodward Ferguson
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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 1st day of February, 2019.

s/ Stinson Ferguson
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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This the 1st day of February, 2019

s/ A. Rachel Pruzin